

UNITED STATES DISTRICT COURT
FOR THE
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA,	§	
Plaintiff	§	
	§	
v.	§	Civil Action No.
	§	
\$15,231.00 IN U.S. CURRENCY,	§	
Defendant in rem	§	

VERIFIED COMPLAINT FOR FORFEITURE IN REM

United States of America, Plaintiff, files this action for forfeiture against approximately \$15,231.00 in United States currency, Defendant in rem, and alleges the following statements.

Nature of the Action

1. This is an action to forfeit property to the United States pursuant to 31 U.S.C. §5317(c)(2).

Defendant in Rem

2. Defendant in rem is approximately \$15,231.00 in United States currency that were seized from Amandip Singh Chahal on February 13, 2011, at the George Bush Intercontinental Airport in Houston, Texas.

Jurisdiction and Venue

3. Because this is an action for forfeiture, this Court has jurisdiction under 28 U.S.C. §1355.

4. Venue is proper in this Court under 28 U.S.C. §§ 1355 and 1395(a) and (b) because:

- a. the acts or omissions giving rise to the forfeiture occurred in the Southern District of Texas,
- b. the property was found in the Southern District of Texas, and
- c. this forfeiture action accrued in the Southern District of Texas.

Basis for Forfeiture

5. The Defendant in rem is subject to forfeiture pursuant to 31 U.S.C. § 5317(c)(2) which provides that any property involved in violations of 31 U.S.C. §§ 5316 and 5324(c) may be forfeited to the United States. These statutes state that:

- 1) a person shall file a report when the person knowingly transports, is about to transport, or has transported a monetary instrument of more than \$10,000 out of the United States. 31 U.S.C. § 5316(a)(1)(A);
- 2) no person shall, for the purpose of evading the reporting requirements of 31 U.S.C. § 5316, fail to file a report required by 31 U.S.C. § 5316. 31 U.S.C. § 5324(c)(1);
- 3) no person shall, for the purpose of evading the reporting

requirements of 31 U.S.C. § 5316, file a report required by 31 U.S.C. § 5316 that contains a material omission or misstatement of fact. 31 U.S.C. § 5324(c)(2).

Facts

6. On February 13, 2011, Amandip Singh Chahal was about to leave the United States aboard a British Airways flight 194 to London, United Kingdom, at the George Bush Intercontinental Airport in Houston, Texas. In the jetway for this flight, a United States Customs and Border Protection Officer (CBP Officer) conducted a Customs outbound inspection. The CBP Officer asked Mr. Chahal if he was transporting more than \$10,000 in any monetary instruments, including cash, for himself or anyone else. Mr. Chahal stated that he was transporting \$10,000, and he was aware of the currency reporting requirements. He said that he was traveling with his mother and father and that he was not carrying any money for them. He confirmed in writing under penalty of perjury that he was carrying only \$10,000.

7. At an inspection table a CBP officer asked Mr. Chahal to place all of his currency on the table. He placed an envelope that contained \$10,000. A CBP officer inspected Mr. Chahal's carry-on bag and found \$5,000 inside a passport holder and \$231 in Mr. Chahal's wallet. In total Mr. Chahal was attempting to transport \$15,231.00 out of the United States. As a result of this, CBP officers

seized the funds for forfeiture.

Relief Requested

8. Plaintiff requests (a) an arrest warrant and summons pursuant to Rule G, Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, (b) a judgment of forfeiture, and (c) costs and other relief to which the Plaintiff may be entitled.

Date June 15, 2011.

Respectfully submitted,

José Angel Moreno
United States Attorney

By: s/ Albert Ratliff
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Verification

I, Pierre Perry, Special Agent, United States Homeland Security Investigations, declare under penalty of perjury as provided by 28 U.S.C. §1746 that I have read this Verified Complaint for Forfeiture in Rem, and the facts stated

in this complaint are true and correct to the best of my knowledge and belief.

Executed on June 15, 2011.



Pierre Perry, Special Agent
U. S. Homeland Security Investigations